

FERNANDO F. CHAVEZ

ffchavez1530@gmail.com

California Bar No. 86902

## LAW OFFICES OF FERNANDO F. CHAVEZ

1530 The Alameda, Suite 301

San Jose, CA 95126

(408) 971-3903 – Phone

(408) 971-0117 – Facsimile

Attnorneys for Greg Vartanian, Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**GREG VARTANIAN, on behalf  
of himself and all others similarly situated,**

### **Plaintiffs.**

VS.

**NATIONWIDE LEGAL, INC.,  
NATIONWIDE LEGAL, LLC, and  
DOES 1-100, inclusive.**

**Defendant.**

Plaintiff, Greg Vartanian, individually, and on behalf of putative class members (“Plaintiffs”), and Defendants, Nationwide Legal, Inc. and Nationwide Legal, LLC (“Defendants”), through their undersigned attorneys, stipulate and respectfully request that this Court approve an extension of time for completion of mediation from April 29, 2013 to June 28, 2013; (b) continue the status conference from May 9, 2013 to July 11, 2013; (c) continue the deadline for Plaintiff to serve his FLSA 216(b) and Rule 23 Class Certification motion from July 16, 2013 to September 13, 2013; and (d) continue the hearing on class certification to from August 22, 2013 to October 31, 2013. As grounds for this extension, the parties state as follows:

1. On February 21, 2013 the parties filed a Notice of Stipulation and Order re  
2 Continuance of Mediation Completion Date (Doc. 52) requesting that (a) the mediation deadline  
3 be moved to April 29, 2013; (b) the status conference be continued to May 6, 2013; and (c)  
4 continuing the deadline for Plaintiff to serve his FLSA and Rule 23 Motion for Class  
5 Certification to July 16, 2013.

6  
7 2. This Court entered an Order (Doc. 53) on February 25, 2013 (a) continuing the  
8 mediation completion date to April 29, 2013; (b) continuing the status conference to May 9,  
9 2013 at 10:30 a.m.; (c) continuing the deadline for Plaintiff to serve his FLSA 216(b) and Rule  
10 23 Class Certification Motion to July 16, 2013; and (d) continuing the hearing on class  
11 certification to August 22, 2013 at 1:30 p.m.

12  
13 3. The parties were scheduled to mediate this matter on April 24, 2013 with Carol  
14 Woodward in San Francisco.

15  
16 4. On Sunday, April 21, 2013 Robert Camp, lead counsel for the Plaintiff, had to  
17 cancel the mediation due to his father-in-law's terminal illness, which required he and his family  
18 to assist in caring for his father-in-law. On April 25, 2013, hospice evaluated the undersigned's  
19 father-in-law and determined that he had a two to three week life expectancy. The undersigned  
20 has been out of the office with his father-in-law since April 21, 2013 and does not expect to be  
21 able to return until the middle of May.

22  
23 5. The undersigned has been the key attorney involved in discussions with defense  
24 counsel, reviewing documents and calculating damages and, as such, is necessary to the  
25 mediation process.

26  
27 6. The undersigned conferred with the mediator and Defendant's counsel on April  
28 21, 2013 to apprise them of the situation and neither is opposed to the requested extension.

7. For the above reasons, the parties request that the Court (a) extend the deadline for completion of mediation from April 29, 2013 to June 28, 2013; (b) continue the status conference from May 9, 2013 to July 11, 2013; (c) continue the deadline for Plaintiff to serve his FLSA 216(b) and Rule 23 Class Certification motion from July 16, 2013 to September 13, 2013; and (d) continue the hearing on class certification to October 31, 2013.

Dated: April 29, 2013

Respectfully submitted,

## **THE COCHRAN FIRM, LLC**

/s/ Robert J. Camp

ROBERT J. CAMP

[rcamp@cochranfirm.com](mailto:rcamp@cochranfirm.com)

Admitted *Pro Hac Vice*  
1929 3<sup>rd</sup> Avenue North, Suite 800  
Birmingham, AL 35203  
(205) 244-1115 – Phone  
(205) 244-1171 – Facsimile

MITCHELL G. ALLEN

mallen@cwcd.com

CORY, WATSON, CROWDER AND DEGARIS

2131 Magnolia Avenue

2101 Magnolia Avenue  
Birmingham, AL 35205

Birmingham, AL 3526  
205-328-2800 - Phone

FERNANDO CHAVEZ

**FERNANDO CHAVEZ**  
fchavez@chavez-deleon.com

California Bar No. 86902

LAW OFFICES OF FERNANDO E. CHAVEZ

**LAW OFFICES OF FERNAN**  
1530 The Alameda, Suite 301

1550 The Alameda, Suite  
San Jose, CA 95126

San Jose, CA 95120  
(408) 871-3903 Phone

(408) 971-3903 - Phone

*Attorneys for Plaintiff*

*Attorneys for Plaintiff*  
**GRIG VARTANIAN**

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/s/ Erin Smith  
MICHELLE LA MAR (SBN 163038)  
[mlamar@loeb.com](mailto:mlamar@loeb.com)  
JON DARYANANI (SBN 205149)  
[jdaryanani@loeb.com](mailto:jdaryanani@loeb.com)  
ERIN SMITH (SBN 235039)  
[esmith@loeb.com](mailto:esmith@loeb.com)  
LOEB & LOEB LLP  
10100 Santa Monica Blvd., Ste. 2200  
Los Angeles, CA 90067  
(310) 282.2000 – Phone  
(310) 282.2200 – Facsimile

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MICHAEL E. ADAMS  
[equitist@earthlink.net](mailto:equitist@earthlink.net)  
LAW OFFICES OF MICHAEL E. ADAMS  
702 Marshall Street, suite 300  
Redwood City, CA 94063  
(650) 599-9463 – Phone  
(650) 599-9785 – Facsimile

*Attorneys for Defendants*  
NATIONWIDE LEGAL, INC. and  
NATIONWIDE LEGAL, LLC

